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10 *Attorneys for Fire Victim Trustee*

11 **UNITED STATES BANKRUPTCY COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**
13 **SAN FRANCISCO DIVISION**

13 In re:
14 **PG&E CORPORATION,**
15 **PACIFIC GAS AND ELECTRIC COMPANY,**
16 **Debtors.**

16 ☐ Affects PG&E Corporation
17 ☐ Affects Pacific Gas and Electric Company
18 ☒ Affects both Debtors

19 ** All papers shall be filed in the Lead Case,*
20 *No. 19-30088 (DM).*

Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administered)

**FIRE VICTIM TRUSTEE'S
STATEMENT OF NON-
OPPOSITION TO AMENDED
CONSOLIDATED MOTIONS
TO ENLARGE TIME FOR
CLAIMANTS TO FILE
PROOFS OF CLAIM FOR
THE PURPOSE OF CLAIM
ADMINISTRATION BY THE
FIRE VICTIM TRUST**

[Relates to Docket Number 12921]

1 Cathy Yanni, in her capacity as the Trustee (the “**Trustee**”) of the Fire Victim Trust (the
2 “**Trust**”), by and through her undersigned counsel and as directed by the *Order Consolidating*
3 *Motions to File Late Claims* entered August 24, 2022 [Docket No. 12875] (the “**Consolidation**
4 **Order**”) and the *Order re Supplemental Exhibit to Order Consolidating Motions to File Late*
5 *Claims* entered September 1, 2022 [Docket No. 12923] (the “**Supplemental Consolidation**
6 **Order**”), respectfully states as follows:

7 1. The Trust has been monitoring all motions filed with this Court that seek to have
8 late-filed proofs of claim deemed “timely” for the purpose of having such claims administered by
9 the Trust.¹

10 2. The *Amended Consolidated Motion to Allow/Deem Timely Late Filing of Claimants,*
11 *and Memorandum of Points and Authorities; Declaration of Regina Bagdasarian in Support;*
12 *Related to Docket No 12919* [Docket No. 12921] (the “**Late Claim Motion**”) seeks to have the
13 time in which to file proofs of claim extended with respect to the proofs of claim of the claimants
14 listed on Exhibit 1 hereto (the “**Proofs of Claim**”). None of the Proofs of Claim appear to have
15 been filed as of the date hereof and counsel for the claimants listed on Exhibit 1 hereto did not
16 respond to an email request from counsel for the Trustee regarding the Proofs of Claim.

17 3. In keeping with the current Trust policy of allowing as many Claimants as possible
18 to receive compensation on account of their Fire Victim Claims, the Trustee does not oppose the
19 Late Claim Motion with respect to the claimants listed on Exhibit 1 hereto, so long as the Proofs of
20 Claim are filed no later than September 30, 2022 and the Trustee is notified of the filings of each of
21 the Proofs of Claim by email to Trustee counsel at ssieger-grimm@brownrudnick.com.

22 4. Given the number of late claim motions filed in recent months² and the amount of
23

24 ¹ The Fire Victim Trust Claims Resolution Procedures (“**CRP**”) mandate that claimants must have
25 timely filed a proof of claim to be eligible to receive compensation from the Trust. See CRP §I.

26 ² Of the 395 late claim motions filed since the December 31, 2019 extended bar date, 217 have been
27 filed in the last six months and 161 were filed in August alone. To put these numbers in perspective, in
28 2020, which included the months immediately after the Extended Bar Date and the effective date of the
Trust (both events that could be expected to prompt the filing of late claim motions), the total number of late
claim motions filed alleging Fire Victim Claims was 55. In 2021, the total number was only 22.

1 time that has passed since the December 31, 2019 bar date for Fire Victim Claims and the February
2 26, 2021 deadline to submit claims questionnaires to the Trust, the Trustee will be discontinuing
3 the current non-opposition policy with respect to late claim motions filed after September 30, 2022.

4 5. The Proofs of Claim and any claims asserted in connection with the Proofs of Claim
5 are subject to the requirements of the CRP and are not allowed or approved by the filing of this
6 statement. Nothing herein shall be construed to be a waiver by the Trust of any right to object to
7 the Proofs of Claim or any claims asserted in connection with the Proofs of Claim on any
8 grounds other than the untimely filing thereof. The Trust may object to any Proof of Claim filed
9 after September 30, 2022 on the ground of untimeliness.

10
11 DATED: September 16, 2022

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25 *Attorneys for Fire Victim Trustee*
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EXHIBIT 1
LIST OF CLAIMANTS

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DATE POC FILED	POC NUMBER	CLAIMANT(S)
No POC Filed	N/A	Linnise Maria and David Montgomery
No POC Filed	N/A	Jesse, Christa, Tenli, Viggo, and Luke McCord
No POC Filed	N/A	Jason, Maria, Jason, Jordan, Taylor and Kealia McCord Atilava Togafau
No POC Filed	N/A	Gary Lynn and Lorraine Gail Koch
No POC Filed	N/A	Michael and Sharan Keene
No POC Filed	N/A	Tyler Allen Dwelle

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